

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES

V.

04 CR 10288-RWZ

JOSEPH BALDASSANO

DEFENDANT'S MOTION TO MODIFY CONDITIONS OF PRETRIAL RELEASE
(ASSENTED TO BY PRE-TRIAL SERVICES OFFICER)

Defendant Joseph Baldassano, by his attorney, moves that this Court modify his conditions of pre-trial release by eliminating the condition of home detention and electronic monitoring.

Defendant submits that instead he should be required to report as directed by the pre-trial services office and otherwise continue to abide by the conditions of release.

This motion is made with the assent of Pre-trial Services Officer Christopher Wylie.

JOSEPH BALDASSANO
By his attorney,

/s/ Elliot M. Weinstein
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Dated: August 28, 2005